

1 ANDRÉ BIROTTE JR.  
United States Attorney  
2 ROBERT E. DUGDALE  
Assistant United States Attorney  
3 Chief, Criminal Division  
STEVEN R. WELK  
4 Assistant United States Attorney  
5 Chief, Asset Forfeiture Section  
JENNIFER M. RESNIK  
6 Assistant United States Attorney  
Asset Forfeiture Section  
7 (Cal. State Bar # 233634)  
8 1400 United States Courthouse  
312 North Spring Street  
9 Los Angeles, California 90012  
Telephone: (213) 894-6595  
10 Facsimile: (213) 894-7177  
11 E-mail: jennifer.resnik@usdoj.gov

12 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
13

14 UNITED STATES DISTRICT COURT  
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
16

17 UNITED STATES OF AMERICA, ) NO. CV 12-05733-JAK (MAN)  
18 Plaintiff, )  
19 v. ) CONSENT JUDGMENT  
20 \$32,150.98 IN U.S. CURRENCY ) **JS-6**  
21 Defendant. )  
22 \_\_\_\_\_ )  
23 REBECCA LARKIN, )  
24 Claimant. )  
\_\_\_\_\_ )

25 RECITALS

- 26 1. This action was filed on July 2, 2012.  
27 2. Notice was given and published in accordance with law.  
28

1           3.     Claimant Rebecca Larkin ("Claimant") filed the only  
2 claim to defendant \$32,150.98 in U.S. currency. Attached to her  
3 verified claim, Rebecca Larkin submitted records related to  
4 lawful and independent sources totaling approximately  
5 \$36,000. However, the government has subsequently provided Ms.  
6 Larkin and her counsel with bank records confirming that her  
7 \$36,000 in funds had gradually been spent over time and that  
8 none of her money still remained in her bank account at the time  
9 the government seized the defendant \$32,150.98 in U.S.  
10 currency. Ms. Larkin and her counsel are satisfied with the  
11 documents presented by the government and for that reason, Ms.  
12 Larkin abandons her claim to the defendant \$32,150.98 in U.S.  
13 currency and consents to judgment in favor of the government.

14           4.     No other statements of interest or answers have been  
15 filed, and the time for filing such statements of interest and  
16 answers has expired. Plaintiff and Claimant have reached an  
17 agreement that is dispositive of the action. The parties hereby  
18 request that the Court enter this Consent Judgment of  
19 Forfeiture.

20           WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:

21           A.     This Court has jurisdiction over this action  
22 pursuant to 28 U.S.C. §§ 1345 and 1355 and over the parties  
23 hereto.

24           B.     The Complaint for Forfeiture states a claim for  
25 relief pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C).

26           C.     Notice of this action has been given in  
27 accordance with law. All potential claimants to defendant  
28 \$32,150.98 in U.S. currency other than Claimant are deemed to

1 have admitted the allegations of the Complaint. The allegations  
2 set out in the Complaint are sufficient to establish a basis for  
3 forfeiture.

4 D. The United States of America shall have judgment  
5 as to all of the defendant currency, together with all interest  
6 earned thereon by the government, and no other person or entity  
7 shall have any right, title or interest therein.

8 E. Claimant hereby releases the United States of  
9 America, its agencies, agents, and officers, including employees  
10 and agents of the United States Federal Bureau of Investigation  
11 and Internal Revenue Service, from any and all claims, actions  
12 or liabilities arising out of or related to this action,  
13 including, without limitation, any claim for attorney's fees,  
14 costs or interest which may be asserted on behalf of the  
15 claimant, whether pursuant to 28 U.S.C. § 2465 or otherwise.

16 ///

17 ///

18 ///

1 F. The court finds that there was reasonable cause  
2 for the seizure of the defendant currency and institution of  
3 these proceedings. This judgment shall be construed as a  
4 certificate of reasonable cause pursuant to 28 U.S.C. § 2465.

5  
6 Dated: December 6, 2012



---

7 THE HONORABLE JOHN A. KRONSTADT  
8 UNITED STATES DISTRICT JUDGE

9 Approved as to form and content:

10  
11 Dated: December\_\_\_\_, 2012

12 ANDRÉ BIROTTE JR.  
United States Attorney  
13 ROBERT E. DUGDALE  
Assistant United States Attorney  
14 Chief, Criminal Division  
STEVEN R. WELK  
15 Assistant United States Attorney  
Chief, Asset Forfeiture Section

16  
17  
18 JENNIFER M. RESNIK  
Assistant United States Attorney  
19 Asset Forfeiture Section

20 Attorneys for Plaintiff  
21 United States of America

22 DATED: December\_\_\_\_, 2012

23  
24  
25 ADAM BRAUN  
Attorney for Claimant  
26 REBECCA LARKIN  
27  
28